

**IN THE UNITED STATES DISTRICT COURT  
OF THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**ARMSTRONG JACOB KNIGHT, #100175**

**PLAINTIFF**

**vs.**

**CIVIL ACTION NO. 1:05cv186LG-JMR**

**SHERIFF GEORGE PAYNE, JR., et al**

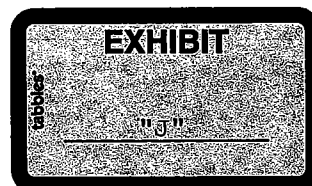
**DEFENDANTS**

STATE OF MISSISSIPPI  
COUNTY OF HARRISON

**AFFIDAVIT OF DOUG BYERS**  
**HARRISON COUNTY SHERIFF'S OFFICE**

PERSONALLY CAME AND APPEARED BEFORE ME the undersigned authority in and for the County and State aforesaid, the within named, Doug Byers, who, after first being duly sworn by me on his oath, did depose and state the following:

1. My name is Doug Byers, and I am over the age of twenty-one (21) years. I am a Deputy with the Harrison County Sheriff's Office, and as a Deputy of the Sheriff's Office I have personal knowledge of the matters and facts contained in this Affidavit and I am competent to testify to the matters stated herein.
2. As a Deputy at the Harrison County Sheriff's Office, I have first hand knowledge of the policies and procedures that are in place at the Harrison County Sheriff's Office. At no time during the incarceration of Plaintiff, Armstrong Jacob Knight, for the period of July 22, 2002 through December 20, 2003, were my actions or the actions of Deputy Thomas Chaussee, toward Plaintiff inappropriate or in violation of these policies and procedures. At all times, myself and Deputy Thomas Chaussee



accordance with the professional standards for inmate management and or supervision as established by the *Harrison County Adult Detention Center Policies and Procedures Directives*.

3. On November 7, 2002, I was present in B-Block, Section D, however at no time did I have any physical altercation with Plaintiff, Armstrong Jacob Knight, nor did I witness anyone else having a physical altercation with Plaintiff, Armstrong Jacob Knight.
4. I have reviewed the Complaint and Amended Complaint filed by Armstrong Jacob Knight in this proceeding and would state that the allegations contained in the Complaint and Amended Complaint as it relates to my actions, are not true. At no time did I use excessive force on Armstrong Jacob Knight during his incarceration at the HCADC.
5. If I utilized any force on Armstrong Jacob Knight, it was only enough force necessary to maintain order and security at the jail, and was also necessary to preserve not only my own health but also the health of other officers and other inmates in the vicinity.

I certify the above declaration is true and correct under penalty of perjury.

/s/Deputy Justin Richards  
Affiant/Deputy Justin Richards  
Harrison County Adult Detention Center

Sworn to and subscribed before me on this the 27th day of February, 2006.

/s/James Darwin McMahan  
Notary Public

My Commission Expires: 04/20/07

(SEAL)